

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Jun 18, 2025**

SEAN F. McAVOY, CLERK

Richard R. Barker  
Acting United States Attorney  
Eastern District of Washington  
Brandon L. Pang  
Assistant United States Attorney  
Post Office Box 1494  
Spokane, WA 99210-1494  
Telephone: (509) 353-2767

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAIME GARCIA and  
KAYLEE LYNN GARDNER,

Defendants.

4:25-CR-6023-MKD

INDICTMENT

Vio.: 21 U.S.C. § 841(a)(1),  
(b)(1)(B)(vi)  
Distribution of 40 Grams or  
More of Fentanyl  
(Counts 1 and 2)

21 U.S.C. §§ 841(a)(1),  
(b)(1)(A)(vi), 846  
Conspiracy to Distribute 400  
Grams or More of Fentanyl  
(Count 3)

18 U.S.C. § 924(c)(1)(A)(i)  
Possession of a Firearm in  
Furtherance of a Drug  
Trafficking Crime  
(Count 4)

21 U.S.C. § 853  
Forfeiture Allegations

1 The Grand Jury charges:

2 COUNT 1

3 On or about May 6, 2025, in the Eastern District of Washington, the  
4 Defendant, JAIME GARCIA, did knowingly and intentionally distribute 40 grams  
5 or more of a mixture or substance containing a detectable amount of N-phenyl-N-  
6 [1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II  
7 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).  
8

9 COUNT 2

10 On or about May 29, 2025, in the Eastern District of Washington, the  
11 Defendant, JAIME GARCIA, did knowingly and intentionally distribute 40 grams  
12 or more of a mixture or substance containing a detectable amount of N-phenyl-N-  
13 [1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II  
14 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).  
15

16 COUNT 3

17 Beginning on a date unknown, but by on or about May 1, 2025, and  
18 continuing to June 12, 2025, in the Eastern District of Washington and elsewhere,  
19 the Defendants, JAIME GARCIA and KAYLEE LYNN GARDNER, did  
20 knowingly and intentionally combine, conspire, confederate and agree together  
21 with each other to commit the following offense: distribution of 400 grams or more  
22 of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-  
23 phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled  
24 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi), all in violation of 21  
25 U.S.C. § 846.

26 COUNT 4

27 On or about June 12, 2025, in the Eastern District of Washington, the  
28 Defendant, JAIME GARCIA, did knowingly possess a firearm, to wit: a Glock 17  
Gen 5, 9mm handgun, bearing serial number BUND128, in furtherance of a drug

1 trafficking crime for which he may be prosecuted in a court of the United States, to  
2 wit: Distribution of 40 Grams or More of Fentanyl, as charged in Counts 1 and 2 of  
3 this Indictment, both in violation of 21 U.S.C. § 841(a)(1), and Conspiracy to  
4 Distribute 400 Grams or More of Fentanyl, as charged in Count 3 of this  
5 Indictment, in violation of 21 U.S.C. § 846, all in violation of 18 U.S.C.  
6 § 924(c)(1)(A)(i).

7 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

8 The allegations set forth in this Indictment are hereby realleged and  
9 incorporated by reference for the purpose of alleging forfeiture.

10 Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of  
11 21 U.S.C. § 841 and/or §846, as set forth in this Indictment, the Defendants, JAIME  
12 GARCIA and KAYLEE LYNN GARDNER, shall forfeit to the United States of  
13 America, any property constituting, or derived from, any proceeds obtained, directly or  
14 indirectly, as the result of such offense(s) and any property used or intended to be used,  
15 in any manner or part, to commit or to facilitate the commission of the offense(s).

16 If any forfeitable property, as a result of any act or omission of the Defendants:

- 17
- 18 a. cannot be located upon the exercise of due diligence;
  - 19 b. has been transferred or sold to, or deposited with, a third party;
  - 20 c. has been placed beyond the jurisdiction of the court;
  - 21 d. has been substantially diminished in value; or
  - 22 e. has been commingled with other property which cannot be  
23 divided without difficulty,

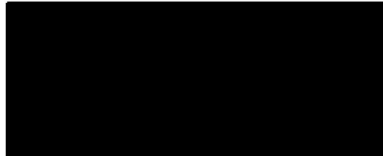
24 the United States of America shall be entitled to forfeiture of substitute property  
25 pursuant to 21 U.S.C. § 853(p).

26 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction  
27 of an offense in violation of 18 U.S.C. § 924(c)(1)(A)(i), as set forth in this  
28 Indictment, the Defendant, JAIME GARCIA, shall forfeit to the United States of

1 America, any firearms and ammunition involved or used in the commission of the  
2 offense.

3 DATED this 18 day of June 2025.

4  
5 A TRUE BILL



9  
10 Rich Barker

11 Richard R. Barker  
12 Acting United States Attorney

13  
14 Brandon L. Pang  
15 Assistant United States Attorney